LAW OFFICES OF:

Timothy D. McNair

ATTORNEY AND COUNSELOR AT LAW

February 1, 2006

VIA FACSIMILE ~ 412-471-8748

Edmond R. Joyal, Jr., Esquire
Law Office of Joseph S. Weimer
975 Two Chatham Center
Pittsburgh, PA 15219

Re: Abby Conley v. County of Erie, et al.

Dear Mr. Joyal:

Thank you for your letter of January 31st. Since we are unavailable for the depositions, it would only make sense to reschedule them. In fact, it would make sense to contact us before scheduling depositions in order to save everyone a lot of time and aggravation.

We note that you have yet to respond to our request for production of documents and, as I am explaining under separate cover, it appears that a Motion for Sanctions will be in order based on your evasive and incomplete responses to our interrogatories. I take your agreement to reschedule the depositions as consent to an extension of time. I will be requesting the Judge for an additional seventy-five (75) days extension of the discovery.

Thank you.

Very truly yours,

LAW OFFICES OF TIMOTHY D. McNAIR

By ______________________
Timothy D. McNair, Esquire

TDM/tad
cc: Abby Conley
Anthony Angelone, Esquire
Mark R. Lane, Esquire

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